

ESTTA Tracking number: **ESTTA629898**

Filing date: **09/29/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92059821
Party	Plaintiff Golestan Co.
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Date	09/29/2014
Attachments	GOLESTAN - Request for Entry of Default.001.pdf(74943 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

<b>Re: <u>U.S. Trademark Registration Number:</u></b>	<b><u>Registered on:</u></b>
<b><u>4,153,549</u></b>	<b><u>June 5, 2012</u></b>
<b><u>3,915,265</u></b>	<b><u>February 1, 2011</u></b>

Golestan Co.,

Petitioner,

v.

Mahalaxmi Exports FZE,

Respondent.

Opposition No. 92059821

**REQUEST FOR ENTRY OF DEFAULT**

**REQUEST FOR ENTRY OF DEFAULT**

1. This is an action for “trademark squatting” in which Respondent, Mahalaxmi Exports FZE, registered Petitioner, Golestan Co.’s trademarks in the United States without Golestan Co.’s knowledge, authorization, or approval.

2. Petitioner, Golestan Co. (hereinafter, “**Petitioner**”), by and through its counsel, Sepehr Daghighian, Esq., petitioned for the cancellation of United States Trademark Numbers 4,153,549 and 3,915,265 (hereinafter, collectively the “**Registrations**”) on August 14, 2014.

3. Registrant was properly served with the Petition for Cancellation initiating documents.

4. The deadline for the Registrant to answer this action was September 27, 2014.

As of September 29, 2014, no answer or other responsive pleading has been filed.

5. Petitioner therefore requests that the Board enter the Registrants' default and cancel the Registrations at issue.

Respectfully submitted,

/s/Sepehr Daghighian, Esq.

Sepehr Daghighian, Esq.

September 29, 2014

**Law Offices of Sepehr Daghighian, P.C.**

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**CERTIFICATE OF SERVICE**

I am a Member of the Bar of California, not a Party in the Action, and I hereby certify that I caused to be served on Attorneys for Opposer a true and correct copy of each of the foregoing documents:

**REQUEST FOR ENTRY OF DEFAULT**

was served on **September 29, 2014** by U.S. First Class Mail with postage prepaid, in an envelope addressed to:

Mahalaxmi Exports FZE  
Sh. Zayed Road  
708, 7<sup>th</sup> Floor, Fairmont Hotel Tower  
Dubai  
UNITED ARAB EMIRATES

Adam E. Schwartz  
Schwartz Intellectual Property Law, PLLC  
244 5th Avenue, #2157  
New York, NY 10001

I declare under the penalties of perjury of the United States that the foregoing is true and correct.

Executed on **September 29, 2014** at Beverly Hills, California.

/s/Kevin Yaghoubzadeh  
Kevin Yaghoubzadeh